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November 17, 2023

VIA ECF

The Honorable Jessica G. L. Clarke
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 20C
New York, NY 10007

Re: *R.R.M.C. v. DHS, et al.*, 23-cv-7946 (JGLC)
Motion to hold the case in abeyance for 30 days

Dear Judge Clarke,

This office represents the Plaintiff R.R.M.C. in the above-referenced matter. Since this action was filed on September 7, 2023, counsel for both R.R.M.C. and Defendants have been in discussions about resolving this matter outside of litigation. In light of these efforts, R.R.M.C. respectfully asks this Court to hold this matter in abeyance for 30 days, which would toll the defendants' November 24, 2023 deadline to respond to the complaint and adjourn the December 15, 2023 pretrial conference and December 8, 2023 deadline for the joint letter and Civil Case Management Plan. Defendants consent to this request. This is the first request by either party for an abeyance, adjournment, or extension.

By December 18, 2023, the parties will provide a status update to the Court, and, if necessary, propose an updated schedule for pleadings and updated availability for the pretrial conference, with the joint letter and Civil Case Management Plan submission date being adjusted accordingly.

We thank the Court for its attention to this matter.

November 17, 2023

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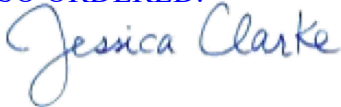
Respectfully submitted,

/s/ Kyle Barron

Kyle Barron
Attorney for Petitioner
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Application GRANTED. The deadline to respond to the Complaint is stayed for 30 days. The December 8, 2023 deadline for the joint letter and proposed case management plan is adjourned as is the December 15, 2023 initial pretrial conference. The parties are directed to file a status letter with the Court by **December 18, 2023**. If the parties wish, they can request a referral to the Court's mediation program or to a magistrate judge for settlement.

SO ORDERED.

A handwritten signature in blue ink that reads "Jessica Clarke". The signature is fluid and cursive, with the first name "Jessica" and last name "Clarke" clearly legible.

JESSICA G. L. CLARKE
United States District Judge

Dated: November 20, 2023
New York, New York